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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CLINTON BROWN,

Plaintiff,

v.

CLARK R. TAYLOR, AICP, THE LOS
ANGELES COUNTY DEPARTMENT
OF REGIONAL PLANNING,

Defendant.

No. 2:22-09203-MEMF-KS

Plaintiff's Speaking Declaration

Judge: Honorable Maame Ewusi-Mensah

Frimpong

Chief Magistrate Judge: Karen L.

Stevenson

PLAINTIFF'S SPEAKING DECLARATION

1. One million dollars is not a lot of money in L.A. and in fact it doesn't even allow one to purchase a home. The value in Los Angeles real estate is the entitlement and zoning. In other words, appreciation from trading paperwork and fees between the owner and the Governmental authority, and if successful, then it is less likely to be a so-called 'pipe dream'. Entitlement can significantly increase a property's value overnight. For example, if this 32.4-acre property was zoned for 200 new homes then the Plaintiff could sell the property for \$30 million plus to a different developer that would build the 200 homes. So, with just one County official's signature and nothing else happening, the property can be worth millions of dollars more overnight. That sounds like 'Blue Sky' and 'Flying Ships', except, in this case, it is undisputable truth.

2. Just look at the tax assessment history or the mortgage history and there one will find a property with a checkered past and a property many would not even bother to consider part

of their real estate portfolio. However, those folks aren't me. Justice Day O'Connor said it better than anyone during the oral arguments in *Rhode Island*¹, "Think of this, there is a poor little widow woman who owns it [property], and she can't possibly develop it or deal with it and she puts it on the market. And somebody comes along and knows the regulation is there but says, look, that regulation is going to have to be applied in a reasonable manner, I'm going to pay you X amount for this property and then challenge it. I mean what's the matter with that?"

3. The last I checked this was still America and property rights are so valued that we have many laws that allow a person to defend their property with deadly force, *if necessary*. This is no different. It's just more complicated and takes time to unravel over 40 years of corruption that has put this perfectly located property in the crosshairs of at least three Governmental jurisdictions; each sapping the value out until someone blinks.

4. It's not my job to enforce the rights of others or dig 40 years down in a bottomless pit of geological reports (this property has over 150) to uncover the 40 years of corruption, and frankly, *I don't care*. I saw this opportunity, I knew what needed to be done if I was denied permits for anything thanks to *Knick*, and with all my might trying to do just that without the state court hostility to property rights. However, it's difficult when it's David vs Goliath. I'm a one-man show and I know and I have conveyed to the Government the value of this property, not on the promises of Blue Sky or Flying Ships, but with data, reason, and logic. I thought it would be better to be transparent and stick with my guns on this and then everything would work out in the end. That, it seems, becomes more unlikely each day that this Court does not *tell me what the law is on this*.

5. I'm either insane or I've come here for a fair and equitable solution to these bedrock principles of the American experiment. Do I have any right to contest an unreasonable restriction banning all residential and/or commercial structures at the discretion of the Government? Do I have a right to the equitable title or legal title or some combination of both for the sweat, blood,

¹ Hear Justice Sandra Day O'Connor (archived at <https://archive.org/details/oral-argument-rhode-island.clip> on November 24, 2023).

and tears (and money) that went into this property and increased its value? Or do I leave here with none?

6. It's frankly gratuitous cruelty that these cases have not been consolidated or the assets put in a receivership, or the Sub V Chapter 11 Bankruptcy attempted be honored at the District Court under the Court's authority and role over Bankruptcy Courts.² I mean, I know this Court, the Government, and frankly the Defendants, don't want to see me waltz in here and then waltz out with 32.4 million dollars. I get that. I'm a reasonable man and I am entitled to a reasonable solution. *In other words*, Just Compensation.

7. Doing the right thing should not cost and be a burden. It's already cost me too much and I don't see any relief ever coming from that, and even if it did, I'm not ready to make nice.

"I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."



Clinton Brown

01/20/2024

² The Federalist No. 42, in The Federalist Papers, at 271 (Clinton Rossiter ed., 1961) (originally published 1788); Article 1, Section 8, Clause 4 "To establish...uniform Laws on the subject of Bankruptcies through-out the United States."